

EXHIBIT E

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July 24, 2017

VIA FACSIMILE (973) 645-4549

Hon. Joseph A. Dickson, U.S.M.J.
Martin Luther King Courthouse
50 Walnut St., Room 5054
Newark, New Jersey 07101

**Re: O'Connor v. The Dodge Company, Inc., et als.
Civ. Action No.: 16-cv-5177 (JLL) (JAD)**

Dear Judge Dickson:

This firm represents Plaintiffs, Patricia O'Connor and Megan O'Connor ("Plaintiffs"), in connection with the above-captioned matter. The parties subject to jurisdictional discovery (Plaintiffs and Defendants Pierce and Hydrol) have met-and-conferred about the remaining jurisdictional discovery in this matter and respectfully request additional time to complete that discovery. Although the parties worked diligently to meet the initial agreed-to and so-ordered deadline, the parties respectfully request additional time to address certain outstanding issues.

The current jurisdictional discovery schedule, submitted via stipulation on March 15, 2017 and so-ordered by Your Honor on March 17, 2017, calls for the conclusion of all such discovery on or before July 24, 2017. Subsequently, the current schedule calls for motions to be filed on or before August 22, 2017, with oppositions due on September 5, 2017 and replies due September 12, 2017. The parties subject to jurisdictional discovery respectfully request an extension of 21 days as to each of the above-referenced deadlines, such that the new schedule would be:

- i. On or before July 28, 2017 Plaintiff will provide medical records and complete responses to Defendants Pierce and Hydrol's deficiency letters;
- ii. On or before August 2, 2017 (unchanged): status update to court;
- iii. August 14, 2017: close of jurisdictional discovery;

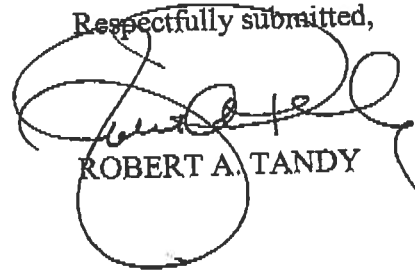
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- iv. To the extent Defendants Hydrol and Pierce elect to renew their motions to dismiss, any such motion shall be filed on or before September 12, 2017, with oppositions due on or before September 26, 2017, and replies due on or before October 3, 2017

Thank you for Your Honor's courtesies in this matter.

Respectfully submitted,



ROBERT A. TANDY

cc: Peri A. Berger, Esq.
Lily H. Shanks, Esq.
Brooke K. Haley, Esq.
Emily R. Weisslitz, Esq.

SO ORDERED

s/Joseph A. Dickson

Joseph A. Dickson, U.S.M.J.

Date: 7/25/17